

CLARK HILL LLP
Timothy M. Flaherty (SBN 99666)
TFlaherty@ClarkHill.com
Melissa M. Palozola (SBN 278858)
MPalozola@ClarkHill.com
One Embarcadero Center, Suite 400
San Francisco, CA 94111
Telephone: (415) 984-8500
Facsimile: (415) 984-8599

Attorneys for Defendant,
Martha Kongsgaard individually and as Trustee of the
Martha Kongsgaard GST Exempt Trust U/T/A
Dated October 21, 1993

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FRANCIS WANG, individually and as Trustee
of WFT-TNG, a California Trust,

Plaintiff,

v.

MARTHA KONGSGAARD, individually and
as Trustee of The Martha Kongsgaard GST
Exempt Trust U/T/A dated October 21, 1993,

Defendant.

Case No. 3:19-cv-00907 EDL

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO COMPLAINT
(CIVIL LOCAL RULE 6-1(B))**

WHEREAS Francis Wang, individually and as Trustee of WFT-TNG, A California Trust
("Plaintiff") and Martha Kongsgaard, individually and as Trustee of the Martha Kongsgaard
GST Exempt Trust U/T/A dated October 21, 1983 ("Defendant"), through their counsel of record
file this Stipulation for Extension of Time to Respond to Complaint and in support state as
follows:

1. This action was filed on February 21, 2019, and Defendant was served on
February 27, 2019;
2. On February 15, 2019, Defendant' filed an action against Plaintiff in California
State Superior Court, County of Napa, Case Number 19CV000286, entitled

Martha Kongsgaard v. Francis Wang, individually and as Trustee of the WFT-TNG Trust, et al. based on the same set of facts and real property dispute which is the subject of this action,

3. Plaintiff and Defendant wish to extend the deadline for Defendant to respond to the Complaint in the instant action to allow the parties time to discuss settlement of this action and the previously filed state court action; and
4. Neither party will be prejudiced by this extension, and it will not alter the date of any event or deadline already fixed by court order.

WHEREFORE, Plaintiff and Defendant hereby Stipulate to extend the deadline for Defendant to file her response to the Complaint in the instant action to April 19, 2019.

Dated: March 18, 2019

PHILLIPS SPALLAS & ANGSTADT LLP

By: /s/ Bradley Jameson
BRADLEY JAMESON

Attorney for Plaintiff,
Francis Wang

Dated: March 18, 2019

CLARK HILL LLP

By: /s/ Timothy M. Flaherty
Timothy M. Flaherty
Melissa M. Palozola

Attorneys for Defendant,
Martha Kongsgaard individually and as Trustee of the
Martha Kongsgaard GST Exempt Trust U/T/A
Dated October 21, 1993